

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	MBD Case No. 22-mc-94017
)	
ZACHARY ZELLA,)	
)	
Defendant.)	

**ASSENTED-TO MOTION TO EXTEND TIME WITHIN WHICH
INDICTMENT OR INFORMATION MUST BE FILED**

The United States of America, by Assistant United States Attorney Danial E. Bennett, hereby moves the Court for an Order, pursuant to 18 U.S.C. §§ 3161(b) and (h)(7), that extends the time within which an indictment or information must be filed in the above-captioned case until **August 12, 2022**.

In support of the motion the government states as follows:

1. Defendant Zachary Zella is charged by criminal complaint, 22-mj-4211-DHH, with Felon in Possession of Ammunition, in violation of 18 U.S.C. § 922(g)(1), and Dealing in Firearms without a License, in violation of 18 U.S.C. § 922(a)(1)(A).
2. Law enforcement arrested Zella on May 26, 2022. He made his initial appearance before the Magistrate Court the same day. On May 31, 2022, Simmons waived his preliminary and had an initial detention hearing that was continued on June 8, 2022, when Zella was ordered detained. Pursuant to 18 U.S.C. § 3161(b), the government has until June 27, 2022, to indict Zella.

3. The parties are exploring the possibility of resolving this case short of a trial. The parties require additional time, however, before such a determination can be made.

4. The government has not previously sought to enlarge the time in which an indictment or information must be filed.

5. The government submits that the delay resulting from the extension of time for filing an indictment or information serves the ends of justice and outweighs the best interest of the public and the defendant in a speedy trial.

6. The government has consulted with defense counsel who has assented to this request.

ACCORDINGLY, the government asks the Court to enter an Order, pursuant to 18 U.S.C. §§ 3161(b) and (h)(7), that extends the time within which an indictment or information must be filed in the above-captioned case until **August 12, 2022** and moves that the period between June May 26, 2022, through August 12, 2022, be excluded from all Speedy Trial Act calculations.

Respectfully submitted,

RACHAEL S. ROLLINS
UNITED STATES ATTORNEY

By: /s/ Danial E. Bennett
DANIAL E. BENNETT (BBO# 657436)
Assistant U.S. Attorney
United States Attorney's Office
District of Massachusetts
Donohue Federal Building
595 Main Street
Worcester, Massachusetts 01608
Danial.Bennett@usdoj.gov

Dated: June 17, 2022

Certificate of Service

This is to certify that I have served defense counsel a copy of the foregoing document by electronic mail.

/s/ Danial E. Bennett
Danial E. Bennett
Assistant U.S. Attorney

Dated: June 17, 2022